



SHERWIN-WILLIAMS.

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December 5, 2007

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Response to USEPA Comments dated November 15, 2007
Evaluation of Strategic Sampling Results - Bridgewood Lake and the Rail Road
Site (August 9, 2006) AOC Index Number: No. II CERCLA-02-99-2035
Gibbsboro Borough, New Jersey

Dear Mr. Klimcsak:

The Sherwin-Williams Company (SWC) is responding to the U.S. Environmental Protection Agency's (USEPA) comments, dated November 15, 2007, on the October 31, 2007, Response to USEPA Comments submitted by SWC.

The October 31, 2007 submittal was in response to the USEPA comments dated June 11, 2007, of the August 9, 2006 *Evaluation of Strategic Sampling Results – Bridgewood Lake and the Rail Road Site* submitted by SWC pursuant to Administrative Order Index No. II CERCLA-02-99-2035. The USEPA comments also included comments from the New Jersey Department of Environmental Protection (NJDEP).

For ease of review, we have included the USEPA's and NJDEP's specific comments followed by SWC response.

RESPONSE TO EPA COMMENTS DATED NOVEMBER 15, 2007

SWC Response to USEPA Bridgewood Lake Sediment Comment #1, page 3

1. Throughout the response letter the terms "fine-grained material" and "soft organic-rich sediment" are used interchangeably. Please use only one term, preferably the term "soft organic-rich sediment".

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SWC Response

In future discussions and submissions SWC will use the term "soft organic-rich sediment", as applicable.

SWC Response to USEPA Bridgewood Lake Sediment Comment #1, page 3

2. Please note, the sediment samples collected at locations BWDD0032 and BWDD0058, which are selected by the SWC to depict the (proposed) relationship between sediment composition (i.e., percent solids and total organic carbon (TOC)) versus the degree to which the presence/absence of contamination exists, appear to have been collected at the location of a former "bridge" and may be fill. As stated by the SWC and agreed to by EPA, the additional sampling operations (to be performed) throughout Bridgewood Lake will provide the additional information in order to make this determination.

SWC Response

SWC acknowledges that data collected during the additional sampling operations (to be performed) will provide additional information regarding the relationship between sediment composition (percent solids and TOC) versus the presence or absence of contamination.

SWC Response to USEPA Bridgewood Lake Sediment Comment #2, page 6

Based on EPA's July 11, 2007 recommendation for the additional vertical delineation of surface sediment samples and the SWC's October 31, 2007 proposal for the collection of both surface and deeper sediment samples; EPA is making the following recommendations for additional vertical delineation, based on Bridgewood Lake Transect designations.

- BWL - 1** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0002 only.
- BWL - 4** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0007 and BWDD0011, but also requests that BWDD0004 and BWDD0014 be further delineated. Also, the newly proposed sediment sample (proposed beyond BWDD0014) is approved as well.
- BWL - 7** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0017 and BWDD0023, but also requests that BWDD0015

be further delineated.

- BWL - 10** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0028, but also requests that BWDD0030 be further delineated.
- BWL - 13** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0031, but also requests that BWDD0033 be further delineated.
- BWL - 14** EPA requests that all three samples: BWDD0034 - 36 be further delineated along this transect.
- BWL - 16** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0037 and BWDD0039.
- BWL - 19** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0042, however, EPA requests that sample locations BWDD0044 and BWDD0046 be further delineated, but not sample location BWDD0045.
- BWL - 20** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0047, but also requests that samples BWDD0048 and BWDD0051 be further delineated.
- BWL - 21** EPA concurs with the proposal to conduct additional vertical delineation sampling at BWDD0053, but also requests that sample BWDD0052 be further delineated.

SWC Response

SWC concurs with USEPA's request above and will collect additional sediment samples at the above-referenced locations. The additional vertical delineation activities (as referenced above) will be limited to the coarser-grained sediments underlying the soft organic-rich sediments. These samples will be collected utilizing a VibracoreTM sampling device as discussed in the October 31, 2007 Response to USEPA Comments. These sample locations have been added to the revised Proposed Sample Location Map that is included with this submission as Figure 2.

SWC Response to USEPA Bridgewood Lake Sediment Comment #2, page 6

EPA concurs with the sample collection procedures, which includes the use of the X-Ray Fluorescence (XRF) screening procedures. In addition, EPA does not require that the additional transects, specified in the approved 2003 Work Plan, be sampled, however, EPA requests that SWC conduct field operations (similar to those "sediment profiling activities" performed by SWC at Bridgewood Lake in 2005) to determine the depth to coarse-grained material in areas of the lake (preferably along transects) not yet "profiled".

SWC Response

SWC concurs with USEPA's request and will collect additional cross-section "profile" measurements at locations approximately half-way between existing transects. Profile measurements will be spaced at approximately 50-foot intervals along each of the transects. The proposed cross-section "profile" measurement locations have been included with this submission as Figure 3.

SWC Response to USEPA Bridgewood Lake Soil Comment #5, page 13

Soil samples to be collected for further delineating contamination at soil sample location BWSB0001 should be analyzed for TAL Metals and not just arsenic.

SWC Response

SWC concurs with the USEPA request and will analyze soil samples collected for delineation purposes at location BWSB0001 for TAL Metals.

SWC Response to NJDEP Additional Comment, page 19

Please remove the last paragraph on the bottom of page 19. The topic of additional Bridgewood Lake sampling is discussed in EPA's comment, "SWC Response to USEPA Bridgewood Lake Sediment Comment #2 page 6" above.

SWC Response

SWC will remove the last paragraph on the bottom of page 19, as requested by USEPA.

RESPONSE TO NJDEP COMMENTS DATED NOVEMBER 14, 2007

NJDEP Comment

Please have Sherwin-Williams provide a schedule indicating the expected date for the submission of a Remedial Investigation Report for the work to be conducted based on the proposals in the approved documents.

SWC Response

A schedule for the proposed field activities to be conducted at Bridgewood Lake is included with this submission.

NJDEP Comment

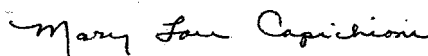
Please note that in response to NJDEP's Comment 4, Sherwin-Williams included the citations for the "Action Levels". This is acceptable to the Department. However, the Department requests that EPA require these action levels to be provided with each deliverable from Sherwin Williams.

SWC Response

SWC will include the citations for the "Action Levels" used in evaluating data in future submissions.

We trust that this response concludes the outstanding issues regarding the next phase of sampling at Bridgewood Lake and the Rail Road Tracks; however, should you have any comments or questions, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,



Mary Lou Capichioni
Director Remediation Services

cc: Jeff Josephson, USEPA-Reg.2
Mindy Pensak, USEPA-Reg.2
William Sy, USEPA-Reg.2
Clay Stern, USFWS
Diane Wehner, NOAA
John Doyon, NJDEP (4 copies)
Lynn Arabia, TetraTech ECI
John Gerulis, SWC
Allen Danzig, Esq., SWC
Susanne Peticolas, Esq., Gibbons P.C.
Sally Jones, Weston
Hank Martin, ELM

**Bridgewood Lake Work Plan
Schedule of Activities**

